

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ROBERT KENNY,

Plaintiff,

V.

PACIFIC INVESTMENT
MANAGEMENT COMPANY LLC, a
Delaware limited liability company;
PIMCO INVESTMENTS LLC.

Defendants.

No. CV 14-1987-RSM

**STIPULATION AND [PROPOSED]
ORDER AMENDING ORDER SETTING
DATES AND DEADLINES IN JOINT
STATUS REPORT AND DISCOVERY
PLAN**

NOTE FOR MOTION: JULY 26, 2017

Plaintiff Robert Kenny (“Plaintiff”) and Defendants Pacific Investment Management Company LLC and PIMCO Investments LLC (collectively, “Defendants”), through their undersigned counsel of record, hereby stipulate and agree as follows:

On September 30, 2016, the parties filed a Stipulation and Proposed Order Amending Order Setting Trial Date and Related Dates and Deadlines in Joint Status Report and Discovery Plan (Dkt. 111), wherein the parties requested additional time to complete expanded discovery obligations and to respond to ongoing discovery requests. Finding good cause shown, the Court on October 4, 2016 entered an Order Amending Order Setting Trial Date and Related Dates and

STIPULATION AND [PROPOSED] ORDER
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116471-0001/136347452.1

Ropes & Gray LLP
Prudential Tower,
800 Boylston St.
Boston, MA 02199-3600
Phone: 617.951.7000
Fax: 617.951.7050

Perkins Coie LLP
1201 Third Avenue,
Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1 Deadlines in Joint Status Report and Discovery Plan (Dkt. 124) (the “Scheduling Order”)
 2 amending the case schedule accordingly.

3 Although the parties have sought to complete fact discovery as expeditiously as possible
 4 and continue to work diligently to this end, in light of the overall volume of documents
 5 produced, ongoing discovery requests, and difficulties in scheduling fact witnesses’ depositions,
 6 the parties have agreed and propose to amend deadlines for the completion of fact discovery and
 7 expert witness reports in the Scheduling Order while preserving the current deadlines for
 8 completion of expert discovery, filing of dispositive motions, and the current trial date.

9 IT IS HEREBY STIPULATED, by and among Plaintiff and Defendants, for good cause
 10 shown, that the below-referenced deadlines in the Scheduling Order be extended, as proposed
 11 below, subject to the Court’s approval:

Event	Current Deadline	Revised Deadline
Fact discovery cutoff	7/28/2017	9/30/2017
Plaintiff shall designate any expert witnesses and serve each expert’s written report pursuant to Fed. R. Civ. P. 26(a)(2)(B) on or before	09/15/2017	10/6/2017
Defendants shall designate any expert witnesses and serve each expert’s report pursuant to Fed. R. Civ. P. 26(a)(2)(B) on or before	11/03/2017	11/24/2017
Plaintiffs shall serve any rebuttal expert reports from previously-designated experts on or before	12/01/2017	12/22/2017

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 1201 Third Avenue,
 Suite 4900
 Seattle, WA 98101-3099
 Phone: 206.359.8000
 Fax: 206.359.9000

1 Dated: this 26th day of July, 2017.
2

3 By: s/ Michael D. Woerner

4 By: s/ Tana Lin

5 By: s/ Laura R. Gerber

6 By: s/ Ian Mensher

7 Michael D. Woerner, WSBA No. 15452

8 Tana Lin, WSBA No. 35271

9 Laura R. Gerber, WSBA No. 34981

10 Ian Mensher, WSBA #39593

11 **Keller Rohrback L.L.P.**

12 1201 Third Avenue, Suite 3200

13 Seattle, WA 98101

14 Telephone: 206-623-1900

15 Facsimile: 206-623-3384

16 Email: mwoerner@kellerrohrback.com

17 tlin@kellerrohrback.com

18 lgerber@kellerrohrback.com

19 imensher@kellerrohrback.com

20 Michael J. Brickman (*Admitted Pro Hac Vice*)

21 **Richardson, Patrick, Westbrook & Brickman,
22 LLC**

23 174 East Bay Street

24 Charleston, SC 29401

25 Telephone: 843-727-6520

26 Facsimile: 843-727-3103

17 Email: mbrickman@rpwb.com

18 Nina Fields Britt (*Admitted Pro Hac Vice*)

19 James C. Bradley (*Admitted Pro Hac Vice*)

20 Matthew A. Nickles (*Admitted Pro Hac Vice*)

21 **Richardson, Patrick, Westbrook & Brickman,
22 LLC**

23 1037 Chuck Dawley Boulevard, Bldg. A

24 Mount Pleasant, SC 29465

25 Telephone: 843-727-6500

26 Facsimile: 843-216-6509

21 Email: nfields@rpwb.com

22 jbradley@rpwb.com

23 mnickles@rpwb.com

24 *Attorneys for Plaintiff*

25 **STIPULATION AND [PROPOSED] ORDER**
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1 By: s/ Ronald L. Berenstain

2 s/ David F. Taylor

3 s/ Sean C. Knowles

4 Ronald L. Berenstain, WSBA No. 7573

5 David F. Taylor, WSBA No. 25689

6 Sean C. Knowles, WSBA No. 39893

7 **Perkins Coie LLP**

8 1201 Third Avenue, Suite 4900

9 Seattle, WA 98101-3099

10 Telephone: 206-359-8000

11 Facsimile: 206-359-9000

12 Email: rberenstain@perkinscoie.com

13 dftaylor@perkinscoie.com

14 sknowles@perkinscoie.com

15 John D. Donovan (*Admitted Pro Hac Vice*)

16 Robert A. Skinner (*Admitted Pro Hac Vice*)

17 Amy D. Roy (*Admitted Pro Hac Vice*)

18 **Ropes & Gray**

19 Prudential Tower

20 800 Boylston Street

21 Boston, MA 02199-3600

22 Telephone: 617-951-7000

23 Facsimile: 617-951-7050

24 Email: john.donovan@ropesgray.com

25 robert.skinner@ropesgray.com

26 amy.roy@ropesgray.com

17 John C. Ertman (*Admitted Pro Hac Vice*)

18 **Ropes & Gray**

19 1211 Avenue of the Americas

20 New York, NY 10036-8704

21 Telephone: 212-596-9000

22 Facsimile: 212-596-9090

23 Email: john.ertman@ropesgray.com

24 **Attorneys for Defendants Pacific Investment
25 Management Company LLC and PIMCO
26 Investments LLC**

11 **Ropes & Gray LLP**

12 Prudential Tower,

13 800 Boylston St.

14 Boston, MA 02199-3600

15 Phone: 617.951.7000

16 Fax: 617.951.7050

11 **Perkins Coie LLP**

12 1201 Third Avenue,

13 Suite 4900

14 Seattle, WA 98101-3099

15 Phone: 206.359.8000

16 Fax: 206.359.9000

1 [PROPOSED] ORDER
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4 Pursuant to stipulation by the parties, and for good cause shown, **IT IS SO ORDERED**
5 this ____ day of _____, 2017.
6

7 Hon. Ricardo S. Martinez
8
9 United States District Judge
10

11 Presented by:
12

13 By: s/ Michael D. Woerner
14

15 By: s/ Tana Lin
16

17 By: s/ Laura R. Gerber
18

19 By: s/ Ian Mensher
20

21 Michael D. Woerner, WSBA No. 15452
22

23 Tana Lin, WSBA No. 35271
24

25 Laura R. Gerber, WSBA No. 34981
26

Ian Mensher, WSBA #39593
Keller Rohrback L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Telephone: 206-623-1900
Facsimile: 206-623-3384
Email: mwoerner@kellerrohrback.com
tlin@kellerrohrback.com
lgerber@kellerrohrback.com
imensher@kellerrohrback.com

Michael J. Brickman (*Admitted Pro Hac Vice*)

Richardson, Patrick, Westbrook & Brickman, LLC

174 East Bay Street
Charleston, SC 29401
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By: s/ Ronald L. Berenstain
s/ David F. Taylor
s/ Sean C. Knowles

Ronald L. Berenstain, WSBA No. 7573

David F. Taylor, WSBA No. 25689

Sean C. Knowles, WSBA No. 39893

Perkins Coie LLP

1201 Third Avenue, Suite 4900

Seattle, WA 98101-3099

Telephone: 206-359-8000

Facsimile: 206-359-9000

Email: rberenstain@perkinscoie.com

dftaylor@perkinscoie.com

sknowles@perkinscoie.com

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Telephone: 617-951-7000

Facsimile: 617-951-7050

Email: john.donovan@ropesgray.com

robert.skinner@ropesgray.com

amy.roy@ropesgray.com

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Ropes & Gray

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Phone: 206.359.8000

Fax: 206.359.9000

1 Email: nfields@rpwb.com
2 jbradley@rpwb.com
3 mnickles@rpwb.com

4 *Attorneys for Plaintiff*

5 Email: john.ertman@ropesgray.com

6 *Attorneys for Defendants Pacific Investment*
7 *Management Company LLC and PIMCO*
8 *Investments LLC*

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CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses indicated on the Court's Electronic Mail Notice List.

DATED: July 26, 2017

By: s/ Ronald L. Berenstain
Ronald L. Berenstain, WSBA No. 7573
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
Email: rberenstain@perkinscoie.com

Attorneys for Defendants Pacific Investment Management Company LLC and PIMCO Investments LLC

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